

HANG & ASSOCIATES, PLLC

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November 20, 2019

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VIA ECF:

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 11/21/2019

Re: Wang et al v. Shun Lee Palace Restaurant, Inc. et al
Case No. 1:17-cv-00840-VSB

Request for Extension of Time to File Consolidated Complaint

Dear Judge Broderick:

Hang & Associated, PLLC (hereafter “Hang Law”) is counsel to plaintiffs Li Weng, Jing Guan, Ya Qiang Zhang, Hui Min Zhao, Jun Ling Zhao, Hui Liang Zhao, Cheng Xia Wang, Ze Jun Zhang, Jun Qing Zhao, Bao Guo Zhang and Chunlin Zhang in the above referenced matter. We write, with the consent of the Defendants, to respectfully request that the deadline for plaintiffs to submit their consolidated complaint be extended to November 29, 2019. The deadline for the submission is November 21, 2019 (Dkt. No. 142). This is Hang Law’s first request for such extension.

Hang Law shared, on November 8, 2019, a word version of their proposed Second Amended Complaint in the matter of *Zhang et al v. T & W Restaurant, Inc. trading as Shun Lee West et al* to Troy Law PLLC (“Troy Law”) so it can propose the first draft of the consolidated complaint. The undersigned subsequently followed up with regard to the draft on November 18 and again on November 19. At around 7:00 pm on November 19, 2019, Troy Law informed Hang Law that Mr. Aaron B. Schweitzer is in a trial this week and a draft will be provided as soon as possible. As of now, we have yet to receive Troy Law’s draft of the consolidated complaint.

To allow sufficient time for Hang Law to review, revise Troy Law’s draft, and for the two firms to finalize the consolidated complaint, Hang Law respectfully requests that the deadline for plaintiffs to submit their consolidated complaint be extended to November 29, 2019.

Respectfully submitted,

/s/ *Keli Liu*

Keli Liu, Esq.

Attorney for Plaintiffs